

August 14, 2015

Adrián de la Rosa
Post-Conviction Investigator
Office of Capital Writs
1700 N. Congress Ave, Suite 460
Austin, TX 78701

Re: Obel Cruz-Garcia

Dear Mr. de la Rosa,

Please allow this letter to serve as my response to your email dated July 29, 2015, regarding our firm's efforts in the defense of Obel Cruz-Garcia.

1. The investigative work was not divided in any particular way. Polly Korzekwa, our background coordinator, did all the background research outlined in our investigative reports.

Whoever authored the investigative report was the obvious Investigator involved. On some occasions Edna Velez interviewed Spanish speakers by herself. On other occasions we conducted the interviews together. An example of these interviews would be the ones we did in the Dominican Republic, the interviews at the jail with the defendant and the State's Spanish speaking cooperating witness, who testified at the trial.

2. The attorneys provided us with all of the offense reports and asked that we background and interview all of witnesses outlined in the reports. We also utilized the State's witness list to identify witnesses that needed to be interviewed. Since our firm has been in business for 26 years we were not informed what to look for since the subject areas on the guilt/innocence witnesses were obvious. As far as the mitigation witnesses were concerned, we were told to get as much beneficial information that we could about the defendant's upbringing, family members, etc.
3. Interaction with the defendant's family members was very cordial. Most of the family members provided as much information as they could to the best of their ability.

4. I have no recollection of suggesting that we travel to Puerto Rico.
5. We did not consider interviewing personnel from the prisons in Puerto Rico since we did not have any specifics on who to interview, nor the content of the information they may possess.
6. I do not remember encountering any challenges in interviewing Houston area witnesses that we could locate.

If you should have any additional questions please feel free to email me.

Sincerely,



JJ Gradoni

JJG/kk

Re: 12-05-0266